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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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11 DWAYNE L. SCHOMER, as special
12 administrator of THE ESTATE OF KEATON
13 M. SCHOMER and individually; and
14 BRAYLEN SCHOMER, individually,

CASE NO. 3:23-cv-00390-ART-CSD

PROTECTIVE ORDER

15 Plaintiffs,

16 vs.

17 ELKO COUNTY; SHERIFF AITOR
18 NARVAIZA, individually; UNDERSHERIFF
19 JUSTIN AIMES, individually; SERGEANT
20 MICHAEL SILVA, individually; DEPUTY
21 TREVOR L. SNEED, individually; DEPUTY
22 DOUGLAS HOLLADAY, individually;
23 DEPUTY ERIKA GONZALEZ, individually;
24 DEPUTY DAVID HATCH, individually;
25 DEPUTY HANNAH KENDALL, individually;
26 MEDALLUS & VACHAROTHONE LTD; DR.
RACHOT VACHAROTHONE, individually;
BAILEY POWELL, individually; GEOFFREY
FISHER, individually; MERCEDES
COCHRELL, individually; LETISCYA
CHACON, individually; DOE SUPERVISORS
I-X; DOE DEPUTIES I-X; DOE MEDICAL
STAFF I-X; and ROE ENTITIES I-X,

27 Defendants.

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SCHOMER and individually, and BRAYLEN SCHOMER, individually (collectively, "Plaintiffs"), by and through their undersigned attorneys at Clark Hill PLLC, Defendants ELKO COUNTY, SHERIFF AITOR NARVAIZA, UNDERSHERIFF JUSTIN AMES, SERGEANT MICHAEL SILVA, DEPUTY TREVOR L. SNEED, DEPUTY DOUGLAS HOLLADAY, DEPUTY ERIKA GONZALEZ, DEPUTY DAVID HATCH, and DEPUTY HANNAH KENDALL (collectively, "Elko Defendants"), by and through their undersigned attorneys at Erickson, Thorpe & Swainston, Ltd.; and Defendants MEDALLUS & VACHAROTHONE LTD, DR. RACHOT VACHAROTHONE, BAILEY POWELL, GEOFFREY FISHER, MERCEDES COCHRELL, and LETISCYA CHACON, (collectively, "Medallus Defendants") by and through their undersigned attorneys at Rencher Anjewierden, hereby files this Joint Motion for Agreed Entry of Protective Order.

To facilitate discovery in this case and to protect allegedly confidential information from public disclosure, the parties request this Court to enter the attached Agreed Protective Order (Exhibit "A") covering certain discovery in this case, specifically items from Lexipol, LLC. The Parties have agreed to the terms in the attached protective order.

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1 WHEREFORE, the Plaintiffs and Defendants respectfully ask the Court to sign and enter
2 the attached proposed agreed protective order.

3 Respectfully submitted this 19th day of September 2024.

4 **CLARK HILL PLLC**

5
6 /s/ Paola M. Armeni, Esq.
PAOLA M. ARMENI, ESQ.
7 Nevada Bar No. 8357
WILLIAM D. SCHULLER, ESQ.
8 Nevada Bar No. 11271
1700 S. Pavilion Center Dr., #500
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10 *Attorneys for Plaintiffs, Schomer Family*

11 **ERICKSON, THORPE & SWAINSTON, LTD.**

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13 /s/ Brent L. Ryman, Esq.
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15 Nevada Bar No. 4533
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17 *Attorneys for Elko County Defendants*

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19 **RENCHER ANJEWIERDEN**

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21 /s/ Benjamin K. Lusty, Esq.
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24 **RUBSY LAW, PLLC**
CHRISTOPHER RUSBY, ESQ.
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36 Stewart Street
25 Reno, Nevada 89501

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27 *Attorneys for Medallus Defendants*

Exhibit A

Exhibit A

1 PAOLA M. ARMENI, Esq.
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11 Attorneys for Plaintiffs,
12 Dwayne L. Schomer and Braylen Schomer,
13 "Schomer Family"

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 * * *

17 DWAYNE L. SCHOMER, as special
18 administrator of THE ESTATE OF KEATON
19 M. SCHOMER and individually; and
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DEPUTY DAVID HATCH, individually;
DEPUTY HANNAH KENDALL, individually;
MEDALLUS & VACHAROTHONE LTD; DR.
RACHOT VACHAROTHONE, individually;
BAILEY POWELL, individually; GEOFFREY
FISHER, individually; MERCEDES
COCHRELL, individually; LETISCYA
CHACON, individually; DOE SUPERVISORS
I-X; DOE DEPUTIES I-X; DOE MEDICAL
STAFF I-X; and ROE ENTITIES I-X,

27 Defendants.

28 CASE NO. 3:23-cv-00390-ART-CSD

**PROTECTIVE ORDER FOR ITEMS
FROM LEXIPOL, LLC**

1 **1. Classified Information Defined.**

2 “Classified Information” means all materials produced by Lexipol, LLC, in response to a
3 subpoena in this case.

4 **2. Use of Classified Information.**

5 All Classified Information shall be used solely for the purposes of litigation, trial, and
6 appeal of this case and for no other purpose and shall not be disclosed except in accordance with
7 the terms hereof.

8 **3. Ongoing Obligations.**

9 Insofar as the provisions of this Protective Order restrict the communication and use of the
10 information protected by it, such provisions shall continue to be binding after the conclusion of
11 this litigation, except that (a) there shall be no restriction on documents that are used as exhibits in
12 motion practice or open court, and (b) a party may seek written permission of the producing party
13 or order of the Court with respect to dissolution or modification of this protective order.

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1 The undersigned counsel hereby stipulates to this protective order.

2 Respectfully submitted this 19th day of September 2024.

3 **CLARK HILL PLLC**

RENCHER ANJEWIERDEN

4 /s/ Paola M. Armeni, Esq.
5 PAOLA M. ARMENI, ESQ.
6 Nevada Bar No. 8357
7 WILLIAM D. SCHULLER, ESQ.
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12 /s/ Benjamin K. Lusty, Esq.
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28 99 West Arroyo Street
29 P.O. Box 3559
30 Reno, Nevada 89505

31 *Attorneys for Elko County Defendants*

32 *Attorneys for Medallus Defendants*

33 At the conclusion of this case, the court will no longer have jurisdiction over this matter.

34 IT IS SO ORDERED:

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37 UNITED STATES MAGISTRATE JUDGE

38 September 20, 2024